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Arizona Corporation Commission

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February 4, 2022

Re: Opposition to the expansion of the Coolidge Generating Station, Docket No. L-00000B-21-0393-00197

Dear Chairman Katz and Members of the Arizona Power Plant and Line Siting Committee,

Thank you for the opportunity to provide these comments on Salt River Project's (SRP) proposed Coolidge Expansion Project.

The City of Phoenix is dedicated to growing a sustainable city where its residents, businesses, and institutions thrive. One of our fundamental values is integrity and transparency, which is why we strive to foster a welcoming, transparent environment as we work to realize a carbon-free future for our city and its people.

Arizona is at the forefront of the climate crisis, and local governments are laying the roadmap to tackle it. Addressing this crisis necessitates that local governments like Phoenix work collaboratively and proactively with their utility service providers to drive down greenhouse gas emissions, reduce environmental impacts, and systematically improve the overall emissions performance of the power grid's generation portfolio.

It is for this reason that I write to raise process and substantive concerns about SRP's Coolidge Expansion Project. While I support investments in the electricity grid to ensure reliable power, significant questions remain unanswered by SRP about the proposal and must be addressed by both the Arizona Power Plant and Line Siting Committee and the Arizona Corporation Commission before nearly \$1 billion in ratepayer money is spent to expand SRP's natural gas fleet.

Specifically:

● **Environmental Impacts**

- What is SRP's gas supply plan for this project? Were these costs factored into scenario modeling?
- What is SRP's water supply plan for this project? Were these costs factored into scenario modeling?
- What carbon and methane impacts and costs did SRP factor into scenario modeling?
- Does this plan impact Pinal County's moratorium on groundwater pumping?
- Was any outreach conducted to agricultural interests in Coolidge about the water use and impacts of this project on their operations?

- What are SRP's plans to use hydrogen at the site? How will this fuel be transported to and stored at the site? Where will it come from? Will the hydrogen be produced by clean energy sources?
- How will the project impact local governments' climate action plan goals?
- What plans does SRP have to reevaluate its sustainability commitments to align itself with the latest climate science?

- **Equity and Community Impacts**

- Recently, more than 285 Randolph residents signed a petition opposing SRP's expansion of the Coolidge Generating Station.¹ What steps has SRP taken and/or will SRP take to address their concerns and related recommendations?²
- According to the 2020 U.S. Census, the residents of Coolidge are more likely to make less money per capita and be Native American, Black, and Hispanic than their Phoenix counterparts.³ How has SRP accounted for these economic and racial disparities in the design and implementation of its proposed project? How does SRP intend to allocate any community benefits from the project so that populations who are directly impacted realize these benefits?
- The area where the Coolidge Generating Station is located is classified as being in "non-attainment" for Particulate Matter (PM) 10,⁴ an air pollutant associated with premature death in people with heart or lung disease, nonfatal heart attacks, irregular heartbeat, aggravated asthma, decreased lung function, increased respiratory symptoms, such as irritation of the airways, and coughing or difficulty breathing.⁵ How has SRP ensured that the implementation of its expansion project would not adversely impact public health outcomes and air quality, including in the underserved and historically disadvantaged communities of Randolph and Coolidge?
- Given the local opposition noted above, what steps did SRP take to ensure its project was designed in close consultation with the communities where the expansion is taking place, especially given the accelerated timeline by which this project came forward and was authorized by the SRP Board?

- **Affordability**

- Did SRP issue a competitive solicitation specific to this project? Why or why not? If not, how can it be sure that it evaluated the full suite of options available to it? If not, how can it be sure that it selected the most affordable, least polluting option?
- How will this project impact rates for all major SRP customer classes? Will costs be evenly allocated between residential and commercial and industrial customer classes? What considerations, if any, have been contemplated for low-income customers?

¹ Randolph residents oppose SRP plant expansion, Pinal Central, January 20, 2022, https://www.pinalcentral.com/coolidge_examiner/news/randolph-residents-oppose-srp-plant-expansion/article_214a08a7-a336-5924-85bf-8b6941fde745.html

² Coolidge & Randolph Deserve Better, <https://www.stopsrpcoolidge.org/what-srp-should-do>

³ QuickFacts: Phoenix and Coolidge Arizona, United States Census Bureau, <https://www.census.gov/quickfacts/fact/table/phoenixcityarizona,coolidgecityarizona/POP060210>

⁴ West Pinal | PM-10 Nonattainment Area, Arizona Department of Environmental Quality, <https://azdeq.gov/west-pinal-pm-10-nonattainment-area>

⁵ Health and Environmental Effects of Particulate Matter (PM), U.S. Environmental Protection Agency, <https://www.epa.gov/pm-pollution/health-and-environmental-effects-particulate-matter-pm>

- If SRP's load growth is primarily driven by commercial and industrial customer expansion, will these customers bear the costs of the project?
- Does SRP anticipate that this project will generate sales and revenues through energy markets in the west? If yes, how much? Will those sales/revenues be publicly reported? Will they offset customer costs?

- **Process and Transparency**

- Why did less than 24 hours transpire between SRP's public announcement of this project and consideration and vote of this project by the SRP Power Committee?
- Is it typical for SRP to review and approve a ~\$953 million investment in ~3 weeks?
- What were all of the scenarios that SRP considered in the evaluation of this project? Has SRP made all of those scenarios available for public review and vetting? Why or why not?
- Why did SRP's load forecast change by almost 1GW since last year? What is driving that change? What independent and public review of its load forecast has SRP conducted?
- What process improvements will SRP make moving forward to address the concerns of diverse stakeholders?

As an elected official of the fifth largest city in the country, I understand that real leadership sometimes requires hitting the pause button to take stock of the situation before acting on it. Looking at the current state of the climate crisis, especially locally and for our rural neighbors, we want to make sure we are all working together to put forth the best solutions possible. Given the breadth and scope of the questions that I and others have raised, and the substantial cost of this project, I strongly urge the Power Arizona Power Plant and Line Siting Committee to deny approval of the Certificate of Environmental Compatibility (CEC) for expansion of the Coolidge Generating Station.

We can deliver better results for Phoenix SRP customers and work to improve quality of life for all who will face the devastating impacts of further investment into fossil fuels.

Please feel free to reach me at council.district.7@phoenix.gov should you have any questions.

Sincerely,



Yassamin Ansari
Phoenix City Councilwoman, District 7